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NDBEDP PN Comments CG Docket No. 10-210

Submitted by Missouri Assistive Technology

Missouri Assistive Technology is pleased to provide the following comments to the Federal Communications Commission regarding the National Deaf-Blind Equipment Distribution Program (NDBEDP). Missouri Assistive Technology (MoAT) is the certified NDBEDP entity for the state of Missouri. MoAT is also Missouri's statewide assistive technology program under the federal Assistive Technology Act as well as the state telecommunications equipment distribution program administrator.

II. Program Structure

Missouri Assistive Technology strongly supports the current NDBEDP structure of having separately certified programs in each state and territory. The advantages of such an approach are overwhelming over those of a national entity for consumers who are deaf-blind. Entities within a state are vastly more familiar with state resources and structures for assessment, equipment demonstration, purchasing, and training than a national entity could ever be. These connections and relationships are vital to meeting the specific needs of eligible individuals in a state. We do not support a single national or multi-state operator, which would add another administrative layer, and reduce efficiency and effectiveness of state programs currently serving their residents who are deaf-blind.

MoAT opposes splitting up program responsibilities (distribution of equipment and/or administrative functions) and the assignment of some or all to a single administrator. The FCC already makes it possible for states to have the option of utilizing national resources for administrative functions. For example, some states have chosen to use the national iCanConnect database, while others have found that their own administrative resources are more effective. It would seem to make little sense to assign any of these programs to a central administrator for states where equipment and administrative functions are working well.

Current certified state NDBEDPs should not be required to re-apply to carry certification over to the permanent period. If there are states where the FCC determines that equipment and services are not being provided, the FCC has the option to select a new certified entity. As for future years, certified programs under the NDBEDP's are very different from the service provided by TRS programs. It is less common for state entities receiving federal formula grants to have to reapply every several years. To avoid potential interruption or uncertainty over services, networks and resources, state administrators should not be required to re-apply for certification unless there are performance or reporting issues for a specific state.

III. Funding

In Missouri, program demand exceeded the state allocation. MoAT requested and received additional allocations from the FCC. The reallocations were essential in meeting the needs of Missouri residents who are deaf-blind. Without the reallocations, consumers would have been forced to wait several months for assessment, equipment and training, or would not have received the devices needed at all. Ideally, states need to know as early as possible in the program year whether they can obtain reallocated funds. If the FCC could develop a means of allowing funds to be reallocated earlier in the funding year, it would prevent a delay in equipment and services for consumers.

If the Commission decides to adopt a centralized web-based system for accounting and reporting, we would anticipate that the bulk of the cost for a well-built system would be one-time, rather than requiring significant annual dollars. It may be worth considering utilizing some funds from the annual \$500,000 set aside for national outreach activities for this purpose. At any rate, states should not be charged individually for use of such a system. If they are, the charges should be considered program costs rather than being subject to the 15 percent administrative cost cap. Reporting requirements should be streamlined to the greatest degree possible to facilitate the submission of claims and reports.

IV. Consumer Eligibility

Missouri has seen no issues with utilizing the current low-income or disability eligibility criteria. We also agree that certified programs should have the flexibility needed to preserve scarce resources to provide high quality services to as many consumers as possible. The amount of the state allocation, availability of services through other programs, demographics, and other factors should be permitted to be taken into consideration by states to best serve residents who are deaf-blind.

We would not support the concept of the FCC directing programs to limit the number of devices that each eligible individual may receive within a specified period of time. By creating inflexible rules, the Commission would be preventing the state program from customizing equipment and services to meet individual state needs.

VI. Individualized Assessment and VII. Installation & Training

The FCC should make a consumer's travel cost a reimbursable expense for any NDBEDP-related activities like device demonstration, assessment, installation and training. In some cases, we have found that this would have been advantageous to consumers to enable them to participate in training with peers and for demonstration of some types of equipment. "Train the trainer" activities should also be reimbursable to help states expand the number of qualified assessment/training providers in their states.

VIII. Outreach & Education

It has been our experience that outreach activities coordinated by individual states have been more effective and efficient than the national activities. National outreach activities do not seem to have been coordinated with the state certified entities. Some participants who had already received equipment through Missouri's program subsequently received national outreach materials, making them think that they should be applying for additional or new equipment or services.

IX. Oversight and Reporting

A standardized national reporting system could benefit state programs as long as state entities are given the opportunity to participate in the design of the system. Any effort to design a system should emphasize the streamlining of accounting and reporting processes to make them less time-consuming for state entities.

Missouri Assistive Technology appreciates the opportunity to provide comments on this critical program for individuals who are deaf-blind.

Sincerely,

C. Marty Exline
Director, Missouri Assistive Technology